UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: LOWER MANHATTAN DISASTER SITE LITIGATION

-----X 07CV01585(AKH)

EDIZON CHAVEZ AND MARTHA L CHAVEZ,

Plaintiffs,

- against –

ANSWER

ALAN KASMAN DBA KASCO, BATTERY PARK CITY AUTHORITY, BLACKMON-MOORING-STEAMATIC CATASTOPHE, INC. D/B/A BMS CAT, BOARD OF MANAGERS OF THE HUDSON VIEW EAST CONDOMINIUM, BROOKFIELD FINANCIAL PROPERTIES, INC., BROOKFIELD FINANCIAL PROPERTIES, LP BROOKFIELD PARTNERS, LP, BROOKFIELD PROPERTIES CORPORATION, BROOKFIELD PROPERTIES HOLDINGS INC., ENVIROTECH CLEAN AIR, INC., GPS ENVIRONMENTAL CONSULTANTS, INC., HUDSON VIEW EAST CONDOMINIUM, HUDSON VIEW TOWERS ASSOCIATES, INDOOR ENVIRONMENTAL TECHNOLOGY, INC., KASCO RESTORATION SERVICES CO., MERRILL LYNCH & CO, INC., RY MANAGEMENT CO., INC., RY MANAGEMENT, SABINE ZERARKA, STRUCTURE TONE (UK), INC., STRUCTURE TONE GLOBAL SERVCIES, INC., VERIZON NEW YORK, INC, WESTON SOLUTIONS, INC., WFP TOWER D CO. G.P.CORP., WFP TOWER D HOLDING CO. I L.P., WFP TOWER D HOLDING CO. II L.P., WFP TOWER D HOLDING I G.P. CORP., AND WFP TOWER D. CO., L.P., ET AL

PLEASE TAKE NOTICE that defendant Envirotech Clean Air Inc. ("Envirotech"), as and for their responses to the allegations set forth in the Complaint by Adoption ("Check-off Complaint") related to the Master Complaint filed in the above-referenced action, hereby adopts Envirotech's Answer to the Master Complaint dated August 3, 2007, which was filed in the matter of *In re World Trade Center Lower Manhattan Disaster Site Litigation*, 21 MC 102 (AKH).

WHEREFORE, the defendant Envirotech demands judgment dismissing the above-captioned action as against each of them, together with costs and disbursements.

Dated: Lake Success, New York September 14, 2007

Yours, etc.

FRIEDMAN, HARFENIST, LANGER & KRAUT Attorneys for Defendant –Envirotech 3000 Marcus Avenue, Suite 2E1 Lake Success, New York 11042 (516) 775-5800

BY: <u>H. Smar</u>

Heather L. Smar (4622)